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January 21, 2022

VIA CM/ECF

Hon. P. Kevin Castel, U.S.D.J.
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

**Re: U.S. v. Ronald Enrique Salguero-Portillo
Cr. No.: 15-379 (PKC) S5**

Dear Judge Castel:

On behalf of defendant, Ronald Enrique Salguero-Portillo, and attorney Robert Feitel, on behalf of defendant Otto Salguero-Morales, I write to request an adjournment on behalf of both defendants, of the next conference in this matter, presently scheduled for February 2, 2021, until any date after March 28, 2022 that may be convenient to the court. I can advise the court that the government has no objection.

Your Honor will please recall that during the last status conference in October of 2021, counsel discussed ongoing defense investigations in Guatemala and Honduras which will yield various documents (well over thousands of pages). It was represented that some of these documents will be produced as defendant's reciprocal discovery. Upon information and belief, these documents will facilitate plea discussions with the intended objective of obviating the need for trial.

The investigation and the retrieval of these documents have been significantly delayed by the pandemic and most recently, the surge of the Omicron variant and related travel restrictions. I can now report to the court that the documents are expected to be available for retrieval next week.

Respectfully, once the documents are obtained and reviewed by counsel, they must be reviewed with defendant. As this court is undoubtedly aware, however, defendant Ronald Salguero-Portillo is housed at the Metropolitan Detention Center, Brooklyn and defendant Otto Salguero-Morales is housed at the Hudson County Correctional Center. Legal visits have been suspended at both facilities unfortunately adding to anticipated delays. Thereafter, it will be necessary to obtain translations for the benefit of this proceeding and the court.

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For these reasons, I respectfully ask that the court grant the relief requested. Should the court be inclined to grant this request, I advise the court that both defendants have no objection to an exclusion of time under the Speedy Trial clock.

I thank Your Honor for your attention and remain,

Respectfully,

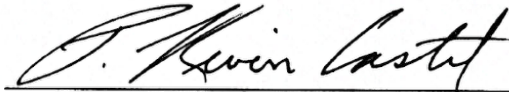


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Application Granted. Upon the application of defense counsel, consented to by the government, the status conference scheduled for Ronald Enrique Salguero-Portillo and Otto Salguero-Morales on February 2, 2022 is adjourned to April 6, 2022 at 12:00 p.m. Time is excluded under the speedy trial act until April 6, 2022 for the reasons set forth in defense counsel's letter dated January 21, 2022. SO ORDERED.

Dated: 1/24/2022



P. Kevin Castel
United States District Judge